

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

KAREN AND MICHAEL MARTIN,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

KEYBANK NATIONAL ASSOCIATION,
KEYCORP, and OVERBY-SEAWELL
COMPANY,
Defendants.

Case No.: 2:22-cv-01346-RJC

JUDGE ROBERT J. COLVILLE

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR KEYBANK DEFENDANTS
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants KeyBank National Association and KeyCorp (collectively, the “KeyBank Defendants”) respectfully request that the Court grant a 39-day extension of their deadline to respond to Plaintiffs’ Complaint, up to and including November 22, 2022.¹ Plaintiffs do not oppose the requested relief.

On September 20, 2022, Plaintiffs filed this action against the KeyBank Defendants. According to the Return of Service for the Summons, the Complaint was served on the KeyBank Defendants on September 23, 2022. The KeyBank Defendants’ deadline to answer or otherwise respond to the Complaint is October 14, 2022. *See* Fed. R. Civ. P. 12(a)(1).

Pursuant to Federal Rule of Civil Procedure 6(b), the KeyBank Defendants request an

¹ The requested extension up to and including November 22, 2022 would result in the same response date as has been set in three related cases pending against KeyBank, N.A. in other districts: (1) *Bozin v. KeyBank, N.A., et al*, Case No.: 1:22-cv-01536-CEF (N.D. Ohio); (2) *Urciuoli v. KeyBank N.A., et al*, Case No. 1:22-cv-01598-OS (N.D. Ohio); and (3) *Samsel v. KeyBank, N.A., et al*, Case No. 1:22-cv-03593-SDG (N.D. Georgia).

extension of this deadline to Tuesday, **November 22, 2022**. Good cause exists for this request, which will allow defense counsel time to assess the Complaint and prepare an appropriate response. The requested extension also will not prejudice the parties or unduly delay these proceedings.

WHEREFORE, the KeyBank Defendants respectfully request that the Court extend its deadline to answer, move, or otherwise respond to the Complaint to November 22, 2022. A proposed order granting the requested extension of time is attached hereto for the Court's consideration.

Dated: October 13, 2022

Respectfully submitted,

BAKER & HOSTETLER LLP

s/ Robert P. Leeson

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*Counsel for Defendants KeyBank, N.A.
and KeyCorp*

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2022, the foregoing was filed with the Clerk of the Court using CM/ECF, which will send notice to the registered attorneys of record that the document has been filed and is available for viewing and downloading.

s/ Robert P. Leeson

Robert P. Leeson

*Counsel for Defendants KeyBank,
N.A. and KeyCorp*